

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WSOU INVESTMENTS, LLC)	
)	PENDING BEFORE THE
Plaintiff,)	UNITED STATES DISTRICT
)	COURT FOR THE WESTERN
v.)	DISTRICT OF TEXAS
)	
SALESFORCE, INC.)	C.A. Nos. 6:20-cv-1163 through
)	-1172 (ADA)
Defendant.)	
)	
)	
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SALESFORCE, INC.)	
)	
Defendant/Third-Party Plaintiff,)	
)	
v.)	C.A. No. 1:23-mc-00027-CFC
)	
WSOU HOLDINGS, LLC and WSOU)	
CAPITAL PARTNERS, LLC)	
)	
Third-Party Defendants.)	

**UNOPPOSED MOTION OF WSOU HOLDINGS AND WSOU CAPITAL
PARTNERS TO STAY MEMORANDUM ORDER RE: SEALING (D.I. 23)**

Non-Party subpoena recipients WSOU Holdings, LLC and WSOU Capital Partners, LLC hereby move the Court to stay further implementation of its February 24, 2023 Memorandum Order (D.I. 23) addressing sealing issues (the “**Sealing Order**”) until at least 9:00 a.m. Eastern Time Tuesday morning February 28, 2023.

Defendant and moving party Salesforce, through its counsel, has indicated that it does not oppose the relief sought by this motion. Pietz Decl., **Ex. 1**.

Further to the Court's order directing the Clerk of Court to unseal certain documents filed by both sides, the following Docket Items are already available on the public docket (as of Friday evening February 24, 2023): 3 (Salesforce's motion to compel opening brief); 16 (Non-Parties' answering brief); 18 (Non-Parties' corporate disclosure statement); and 20 (Non-Parties' motion to transfer) (the "**New Public Entries**").

The following Docket Items that were originally filed under seal, portions of which have now been ordered unsealed per the Sealing Order, are *not* currently available to the public (as of Friday evening February 24, 2023): 4 (Slobodyanyuk Decl.), 5 (Kneitel Decl. with Exhibits 1 to 29); 17 (Burke Decl. with Exhibits A to M); 21 (Knieta Decl. [refiled version] with Exhibits 1 to 29) (the "**Still Sealed Entries**").

By this motion, Holdings and Capital Partners ask the Court to stay further implementation of the Sealing Order, and keep the Still Sealed Entries off the public docket, until at least 9:00 a.m. Eastern Time Tuesday morning February 28, 2023.

The purpose for this emergency request is to allow the parties to this case an opportunity to give notice to others—including the plaintiff, WSOU Investments, Inc.—of this Court's Sealing Order, and to give the parties to this case or any other

party with an interest in the confidentiality of the information at stake an opportunity to seek further relief, as may be appropriate, prior to the Still Sealed Entries becoming public.

Dated: February 24, 2023

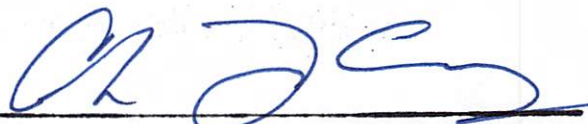
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SO ORDERED, this 27th day of February, 2023



United States District Judge